

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD.,)	
SAMSUNG ELECTRONICS AMERICA,)	
INC., SAMSUNG SEMICONDUCTOR, INC.,)	LEAD CASE
)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST, INC.'S
OPPOSED MOTION FOR LEAVE TO FILE ITS SECOND AMENDED
COMPLAINT**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposed Motion for Leave to File its Second Amended Complaint. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of Netlist’s proposed Second Amended Complaint.

3. Attached as **Exhibit 2** is a redline version of Netlist’s proposed Second Amended Complaint reflecting the changes from Netlist’s First Amended Complaint (Dkt. 12).

4. Attached as **Exhibit 3** is a true and correct copy of U.S. Patent. No. 10,268,608.

5. Attached as **Exhibit 4** is a true and correct copy of emails between counsel for Samsung and counsel for Netlist between December 27, 2022 and January 12, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 20, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby